

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

WARREN CANNADA, )  
                        )  
Plaintiff,           )  
                        )  
v.                     )       **Case No. 3:20-cv-952**  
                        )  
OLD DOMINION BRUSH COMPANY, INC. )  
                        )  
Defendant.           )  
                        )

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**PLAINTIFF'S PROPOSED JURY INSTRUCTIONS**

Plaintiff, Warren Cannada (“Plaintiff” or “Cannada”), by counsel pursuant to this Court’s Scheduling Order, (ECF No. 8-1), hereby submits the attached proposed jury instructions and verdict form. Plaintiff reserves the right to amend, withdraw and/or propose such other instructions as may become appropriate during the course of the trial. Additionally, in accordance with the Court’s Order, counsel will work with defense counsel to submit an agreed upon set.

Respectfully submitted,

**WARREN CANNADA**

*Plaintiff,*

By: \_\_\_\_\_ /s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of February, 2022, a copy of the foregoing was filed electronically with the clerk of court using CM/ECF system, which will send notification of such filing (NEF) to the following:

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